

AMERICAN SAMOA MEDICAL CENTER AUTHORITY
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July 2, 2002

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Chairman Powell and Commissioners:

FCC Docket 02-60 – Designation of Urban Areas of Pacific Insular Areas

The LBJ Tropical Medical Center (LBJ TMC) is grateful for the opportunity to provide comments on FCC Docket 02-60. The docket provides us with an opportunity to revisit the issue of the designation of the “urban area” for the Pacific Insular Areas raised in CC Docket 96-45, December 1999.

The LBJ TMC respectfully requests the Commission to exercise its authority to designate Honolulu as the “urban area” for American Samoa.

The “urban area” for American Samoa is currently designated as Pago Pago, the capitol village of our territory. Pago Pago only has a population of 4,278 (source: U.S. Census 2000). The territory does not have a city or village with a population of 50,000. This is why the U.S. Department of Agriculture defines the whole of American Samoa as rural, as does the Rural Health Care Program.

The current designation means that the RHCP will only support links within our territory, and this does not meet the health care needs in American Samoa. As the Commission can well imagine, a population of 57,291 (source: U.S. Census 2000) cannot support medical specialists, an academic institution of higher education that provides basic and continuing nursing, public health or medical education; or advanced medical facilities. This is especially true when the annual per capita income is only \$4,357 (source: U.S. Census 2000). A true urban area needs to be designated for American Samoa.

The closest urban area to American Samoa with a population of over 50,000 is Honolulu, Hawaii. Honolulu also has a medical school, advanced medical facilities, and a “State Telehealth Access Network” (STAN) that interconnects health care providers and academic institutions. The STAN connects 21 hospitals, clinics, the Veterans Administration Medical and Regional Office Center/Tripler Army Medical Center, and the University of Hawaii School of Medicine, School of Nursing, and School of Public Health. A single connection into this network would provide direct links to all other sites for telehealth and telemedicine applications. American Samoa would be able to participate in the full range of telehealth and telemedicine by designating Honolulu as the urban area for American Samoa.

The LBJ TMC and DOH have been especially frustrated with the fact that the local exchange and long distance telecommunication carriers in American Samoa assess universal service fees on its residential, business, and government bills.

The frustration is further compounded by the fact that the American Samoa Department of Education is able to participate in the Schools and Libraries Program of the Universal Service Administrative Company. Additionally, because of the our income level and participation level in the school lunch program, the schools at the 90% discount level, further supporting our needs.

We have discussed the shared use of the off-island network connections for both Telecommunications Services and Internet Access and would strongly support any effort that would enable our health care system to share capacity with the AS-DOE Department of Education. As such, we hope and encourage the FCC to pass orders that would enable such sharing between the RHCP and SLD programs.

In this regard, FCC might consider a mechanism that defines “health care providers in the Pacific Insular areas to be schools and/or libraries for the purposes of the universal service program” with the pro-rated cost between the Schools and Libraries program to be applied based on the estimates of the usage. Such an approach would help in the case of American Samoa since the schools have an off-island link for Telecommunications Services and Internet Access.

In summary, the current designation of Pago Pago as an “urban area” for American Samoa is inappropriate and the LBJ TMC and Department of Health respectfully urges the Commission to exercise its authority to designate Honolulu as the “urban area” for American Samoa.

Sincerely,

TAUFETE’E JOHN FAUMUINA
Chief Executive Officer

cc: Honorable Tauese Sunia, Governor of American Samoa
Honorable Faleaomavaega E. Hunkin, Member of Congress
Mr. Aleki Sene, Director, American Samoa Telecommunications Authority
Mr. Iulogologo Pereira, Chairman, American Samoa Medical Center Authority